

Cleaner Greener Safer

Sudbury Town Residents' Association First in Brent with a Neighbourhood Plan

Postal address: STRA, C/o Church Hall, 809 Harrow Road, Wembley, Middlesex HA0 2LP

Website: www.stra.org.uk

email: info@stra.org.uk

email: chair@stra.org.uk

Monday, 15 January 2024

Mr Paul Lewin
Planning Policy & Projects Manager
London Borough of Brent
Brent Civic Centre
Engineers Way Wembley Park HA9 0FJ

Dear Mr Lewin,

Reference your email dated 19 December 2023. Please see following response in **red** to the STRA Neighbourhood Forum Application Decision Notice.

Neighbourhood Planning forum Refusal Statement Town and Country Planning Act 1990 (section 61F) (the Act) and The Neighbourhood Planning (General) Regulations 2012 (Regulation 10(2)) (the Regulations)

Name of designated neighbourhood planning area:
Sudbury Town Neighbourhood Area

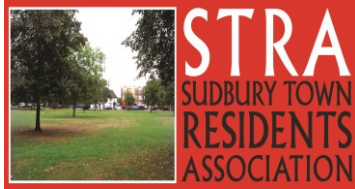
Name of Applicant:
Sudbury Town Residents' Association (STRA)
Consultation Period: 12th January and 23rd February 2023

Decision:

Notice is hereby given that the London Borough of Brent, pursuant to a decision made on the 16th of November 2023, has refused the designation of the Sudbury Town Residents' Association Neighbourhood Forum.

Consultation feedback:

In relation to the desirability to designate, through the public consultation regarding the designation of the Sudbury Town Neighbourhood Forum whilst a small number were supportive, greater than half of all respondents who submitted representations objected to the designation of the forum.



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Reasons included lack of transparency of the organisation and representation in relation to meetings and other material, lack of meetings of a frequency consistent with the constitution, lack of focus and clarity on neighbourhood planning matters, lack of political impartiality and the requirement of a membership fee.

Lack of transparency of the organisation

STRA vehemently refutes this statement. STRA has always been open and transparent. STRA is still open and transparent to all residents living and working in Sudbury. STRA is open and transparent to all the businesses in Sudbury. STRA's openness is recognised by the annual publishing of STRA's Annual Report and Financial Statements. STRA's Annual Report and Financial Statements are available for scrutiny at all times.

Brent Council talks about the number of supportive and non-supportive residents of STRA in their decision to refuse renewal of STRA's Forum status. These numbers were never shared with STRA and STRA till date has never received an update. Several residents have asked the question WHY?

STRA surveys that were organised during this period illustrated that there are a large number of residents and business who support of STRA.

Lack of meetings of a frequency consistent with the constitution

STRA refutes this assertion. Meetings were held frequently including the AGMs. Over two years COVID prevented face to face meetings. STRA continuously communicated with residents and businesses via multimedia, Facebook, twitter, Instagram, STRA Centre Stage and emails.

Other meetings agreed and set by Brent Council were cancelled by Brent Council at short notice. Lack of communication has always been because the agreed meetings were cancelled by Brent Council, which Paul Lewin is fully aware of.

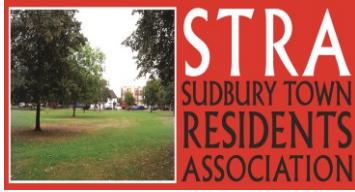
Lack of focus and clarity on neighbourhood planning matters

STRA strongly refutes this claim.

STRA has been at the forefront on major planning issues in Sudbury, which includes, Sudbury Town Car Park being sold to build flats.

STRA participated on all thirteen days of the London Borough of Brent Draft Local Plan. STRA was represented by Barrister Michael Brendan Brett.

Councillors and Officers of Brent Council were invited to all STRAs meetings which many of them did not attend.



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Lack of political impartiality

This is not true. STRA has been extremely mindful NOT to participate or affiliate with any political party.

STRA Executive met with the Chief Executive Caroline Downs in February 2023. Alice Lester and Zahur Khan were present at the meeting when STRA Executive discussed in detail that STRA from 2011 always had a good working relationship with Brent Council Executive. STRA questioned Caroline Downs as to why Brent Council was dragging its feet to renew STRA's Forum Status. STRA's application was submitted in December 2022. At the meeting STRA repeatedly stated that STRA was not anti-Labour and was not affiliated to any political party. STRA was and has always been impartial.

The response STRA received from Caroline Downs is that we should respond to Paul Lewin's questions, which STRA did immediately.

What proof has Brent Council got that STRA is not impartial? STRA has always emphasised that STRA is non-political. Where there has been doubt STRA has always found a solution. STRA has always been transparent with Brent Council and Brent Council has the evidence.

Membership fee

No membership fee has been charged for the years 2019, 2020, 2021, 2022, 2023 and 2024. Forum Status does not state that charging a fee is prohibited.

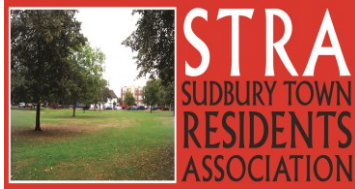
STRA has confirmed at all the meetings with Brent Council that STRA has not charged a fee for membership for the last 4 years. STRA requested at the meeting at the Civic Centre with Dave Chetwyn and Sudbury Matters to include this fact in the minutes which we never received even though we requested a copy of the minutes on many occasions.

The question now raised by residents / members "Where is the transparency?"

The Council considers STRA's submitted constitution's requirement for payment of membership fee as incompatible with Section 61 F (5) (b) (ii) of the Act in that membership is considered to not be genuinely open to any individual who lives or works in the area and therefore is considered to fail 61(5)(b) in this respect.

This interpretation by Brent Council is incorrect. There are no restrictions specified in respect of membership fees in the statute. STRA has not charged a fee for the last four years. STRA has not charged a fee for the last four years including this year 2024.

The Act Section 61F(7)



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Taking account of the application and responses, the Council considers that the application does not satisfactorily evidence that STRA's membership is drawn from different places in the neighbourhood area concerned and from different sections of the community in that area. The potential reflectiveness of the membership of the area due to the actions of STRA in the past is also a concern in relation to a number of matters associated with the constitution. The residents' concerns raised to the Council in 2019, as well as (former) local councillor concerns and consultation responses indicate that a significant minority do not feel comfortable with previous conduct of some of the STRA executive in relation to other STRA executive members or other STRA members, or the way business is conducted at STRA meetings. Without any proposed changes, they have no confidence in the ability of the organisation to address this satisfactorily. Taking account of these factors, it is considered the application does not meet the 61(7)(a)(ii) test.

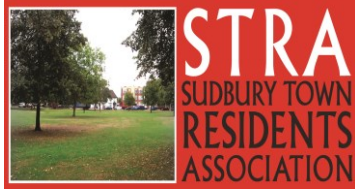
The above conclusions are refuted by STRA. Members are from the residents who live, work or run a business in Sudbury. STRA has requested proof and evidence of these assertions from Brent Council but has not received any evidence or proof that these accusations are true.

Where is the evidence ?

Other matters taken into account for the purposes of the Section 61F(5) decision. The level of dissatisfaction amongst some existing and former ordinary members is so great that it has been one of the contributing factors to a rival 'Sudbury Matters' submission. This indicates a significant unease in the community with STRA continuing to be a neighbourhood forum. STRA has not to any significant degree sought to allay the concerns, either in the material supplied in support of the application, or positive and meaningful on-going engagement with the Urban Vision independent representative who has sought to bring greater consensus on a prospective forum for the area. The matter of respect of members views and behaviours has not been sufficiently addressed in the application. Therefore, there is no expectation that such issues will not remain in affecting the accessibility and transparency of the organisation, likely disenfranchising people who would otherwise want to be active in taking forward neighbourhood planning in the area.

STRA vehemently refutes the above accusations. Till date there is no evidence or proof provided by Brent Council which support these accusations.

The Brent Council consultation relating to the STRA Forum Renewal application was carried out in January 2023 to February 2023. The results / outcome of this consultation was never published. STRA carried out a survey running parallel with Brent Council's consultation. The STRA survey reflected 200 plus residents voted for STRA to continue being the Neighbourhood Forum. STRA made Brent Council aware of these results.



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STRA has not received a response from Brent Council to the questions that STRA raised in respect of Sudbury Matters.

STRA's capacity to fulfil its constitutional obligations is, based on previous performance, uncertain. The frequency of meetings has been inconsistent with STRA's constitution, which sets out an Ordinary Meeting or Public Meeting of the officers and members will be held at least three times a year. This has not occurred since 2019. STRA's website is very dated, and details of meetings minutes are not publicly available on it; the last one being the 2018 AGM. As such, its openness and accountability are also unclear.

STRA once again refutes the assertions that STRA is not credible. These assertions are hearsay with NO evidence or proof.

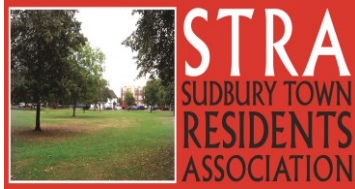
The Council considers STRA's submitted constitution fails to sufficiently address the Council's previously raised need for STRA to clearly address the different spatial coverage and clarity around decision making in relation to how it operates as a residents' association and in matters related to the statutory role as a neighbourhood forum.

STRA once again refutes these accusations. The uncertainty and transparency at Brent Council is encouraging STRA members and residents to question Brent Council's decision in relation to STRA. The members and residents continually ask the question WHY what is the reason.

STRA has always maintained cordial relations with the residents and businesses in Sudbury at all times. STRA uses multimedia extensively including STRA Centre Stage and social events throughout the year. Extensive leafleting. Posters advertising STRA is on the Notice Board. STRA endeavours at all times to attend community events – e.g. local fairs and fetes. Many surveys were carried out by door to door knocking which is on record at Brent Council.

STRA has not submitted a creditable response to requests from the Council for an indicative work plan related to neighbourhood planning matters. This lack of clarity on priorities and likely outcomes for the local community is considered to be inconsistent with the desire shown in consultation responses from a significant body of the local community for meaningful momentum on neighbourhood planning matters to occur.

STRA has continuously communicated with Brent Council by email and in person. The above accusation that STRA has not submitted a creditable response is not true. At the meeting with CEO Caroline Downs (now retired since April 2023) Zahur Khan and Alice Lester STRA explained in great detail and responded positively to all the questions raised by Caroline Downs, Zahur Khan and Alice



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Lester. Again, lack of progress is for Brent Council not responding to STRA's questions and not providing relevant clarity. Again members / residents raise the question WHY?

Notwithstanding the work that STRA has historically done in taking forward a neighbourhood plan, given the issues raised and on-going discussions with STRA since early 2019, plus the responses to the consultation the above issues cannot be regarded as minor, and STRA given the benefit of the doubt that these limitations will resolve themselves.

The issues raised are hearsay. There is no evidence or proof to support these assertions. STRA does not take on board hearsay. STRA looks for evidence and clarity.

Taking account of the factors set out above and considered in full in the Report to Cabinet, it is considered that it would not be appropriate to approve STRA's application as a neighbourhood forum.

STRA Executive state that the assertions and accusations are not true and have not been substantiated with evidence or proof of wrong doing. The community do not understand or accept the refusal by Brent Council to renew the STRA Forum status after all these years. The members and residents continue to ask WHY?

Yours sincerely

Renu Kaul

Chair on behalf of the STRA Executive Committee

Independent



Intercultural



Impartial



Sudbury Town Neighbourhood Plan adopted by Brent Council

The aims and objectives of the Association are non-party, non-sectarian and to encourage community involvement to work together to improve the area we live in.